

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM N. MARTIN JR.,

Defendant.

Case No.

[T. 18 U.S.C. § 2252(a)(2)]

[Green Bay]  
**04-CR040**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about January 21, 2004, in the State and Eastern District of Wisconsin, and  
elsewhere,

**WILLIAM N. MARTIN JR.,**

the defendant, knowingly received a visual depiction of minors engaging in sexually explicit  
conduct that had been shipped and transported in interstate commerce, by means of a computer,  
and identified by the file name "RhyssynMe.wmv." This visual depiction shows, and was  
produced involving the use of minors engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 22, 2004, in the State and Eastern District of Wisconsin, and elsewhere,

**WILLIAM MARTIN JR.,**

the defendant, knowingly received a visual depiction of a minor engaging in sexually explicit conduct that had been shipped and transported in interstate commerce, by means of a computer, and identified by the file name "m12priv\_079.jpg." This visual depiction shows, and was produced involving the use of a minor engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Section 2252(a)(2).

**FORFEITURE NOTICE**

Upon conviction of either Count One or Two of the Indictment, the defendant,

**WILLIAM MARTIN JR.,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Section 2251, 2251A, or 2252 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offense, including, but not limited to, the following:

1. One Seagate Baracuda ST380011A hard drive, Serial number 5JV09DEH;
2. One Western Digital WD300BB-32CCB) hard drive, Serial number WMA9U1494390;
3. One Maxtor Diamond Max+9 hard drive, Serial number Y251NSE;
4. One Western Digital WD800JB-00CRA1 hard drive, Serial number WMA8E7975534; and
5. Any equipment, instrumentalities, and items used or intended to be used in the receiving, distribution, or possession of child pornography.

A TRUE BILL:

  
FOREPERSON

Dated: 2-18-04

  
STEVEN M. BISKUPIC  
United States Attorney